

UNITED STATES DISTRICT COURT

for the
District of Maryland

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

United States of America
v.

Adrión Desouza
8515 Snouffer School Rd 3101
Gaithersburg, MD 20879-5533
YOB: 1980; SSN: ***-**-0793

Case No.

19-po- 4147 - C 000

2020 JAN 13 A 11: 22

CLERK'S OFFICE
AT GREENBELT
BY _____ DEPUTY

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 10, 2019 in the county of Montgomery in the
District of Maryland, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. Sec. 1701

knowingly and willfully did obstruct and retard the passage of U.S. mail in
violation of Title 18, United States Code Section 1701.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Complainant's signature

SA Michael Wu, USPS-OIG, 202-394-2871

Printed name and title

Sworn to before me and signed in my presence.

Date: 01/13/2020

City and state: Greenbelt, Maryland

Judge's signature

Charles B. Day, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I. Introduction

1. I am a Special Agent (SA) and have been employed with the U.S. Postal Service (Postal Service) Office of Inspector General (OIG), since June 2012. I have been a SA since January 2014. I am currently assigned to the Capital Metro Area Field Office, Mail Theft Team. As part of my duties, I investigate a wide variety of violations of federal criminal laws, including violations of Title 18, United States Code Sections 1701 (Obstruction of mail); 1703 (Delay or destruction of mail or newspapers) and 1709 (Theft of mail matter by officer or employee). My law enforcement training and experience has included the preparation, presentation, and service of criminal complaints, arrest warrants, and search warrants. I have experience in, and have received training in, general law enforcement, criminal investigations, and mail theft and financial fraud investigations.

2. This affidavit is submitted in support of a summons and criminal complaint charging **ADRION DESOUZA** ("**DESOUZA**") with one count of knowingly and willfully obstructing or retarding the passage of U.S. mail in violation of Title 18, United States Code Section 1701.

3. The facts and information contained in this affidavit are based on my personal knowledge and observations made during the course of this investigation, information provided to me by other law enforcement personnel, information provided by witnesses, and/or a review of records and documents. I have not included every fact known to me about this investigation, but rather only those facts that are sufficient to establish probable cause.

II. Details of Investigation & Probable Cause

4. The defendant **DESOUZA** is employed by the United States Postal Service, Montgomery Village Post Office, Gaithersburg, MD 20898, as a city carrier assistant. The defendant's responsibilities included the sorting, handling, and delivering mail at Montgomery Village Post Office.

5. On September 10, 2019, I received information from Jeremy Mead, supervisor of customer service, Montgomery Village Post Office, Gaithersburg, MD, regarding bundles of undelivered Red Plum Circulars (U.S. Standard Mail) dumped outside a customer's residence (Shirley Gustafson) located on 4905 Emory Grove Road, Gaithersburg, MD. The recovered mail belonged to route C009, zip code 20879.

6. The customer who recovered the mail stated that, on September 10, 2019, she saw a mail carrier outside her residence by the wooded area dump mail. She stated she was unable to identify the carrier, but stated when she went to the same area where the carrier parked the postal truck, she saw a pile of Red Plum circulars (Standard Mail).

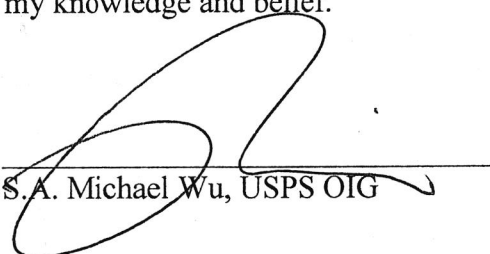
7. A review of the mail and postal database records further indicated **DESOUZA** was the carrier assigned to deliver route C009 on September 10, 2019. There were approximately two bundles of Red Plum circulars, totaling 250 pieces of mail that was not delivered.

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8. On September 23, 2019, I interviewed **DESOUZA**. He admitted he did not deliver all the mail assigned to him on September 10, 2019. **DESOUZA** stated he dumped approximately two or three bundles of Red Plum advertisements in the woods located on 9405 Emory Grove Road, Gaithersburg, MD.

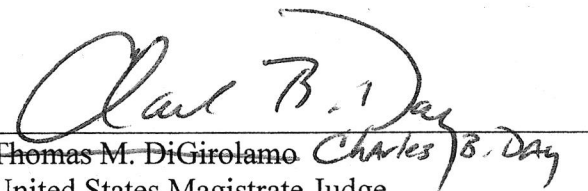
9. Based on the foregoing, I respectfully submit that there is probable cause to believe that the defendant knowingly and willfully did obstruct or retard the passage of U.S. mail in violation of Title 18, United States Code Section 1701. Therefore, I respectfully request that a summons and criminal complaint be issued for the defendant.

I hereby certify that the above affidavit is true to the best of my knowledge and belief.



S.A. Michael Wu, USPS OIG

Sworn to before me, this 13th day of January, 2020.



Thomas M. DiGirolamo
United States Magistrate Judge